



**Gideon Orion Oliver**

—ATTORNEY AT LAW—

He/him/his

277 Broadway, Suite 1501

New York, NY 10007

1825 Foster Avenue, Suite 1K

Brooklyn, NY 11230

Gideon@GideonLaw.com\*

**GideonLaw.com**

**Office:** (718) 783-3682

**Signal:** (646) 263-3495

**Fax:** (646) 349-2914\*

*\*Not for service*

January 7, 2020

**BY ECF**

Hon. P. Kevin Castel  
US District Court  
500 Pearl Street  
New York, NY 10007

Re: *Marom, et al. v. City of New York, et al.*, 15-cv-2017 (PKC)(SN)  
Your Honor:

I represent Plaintiffs in the above-captioned matter, which is scheduled to be tried beginning on March 30, 2020. I write to request a brief adjustment of the January 17, 2020 deadline (*see* Dkt. 175) by which Plaintiff's proposed jury charge, verdict sheet, *voir dire*, and *in limine* motions are to be filed with the Court, and Plaintiff's draft Joint Pretrial Order is to be provided to Defendants, until February 3, 2020; or, alternately, until a date after January 20, 2020 but as close to February 3, 2020 as possible. The final initial pretrial conference is scheduled for March 20, 2020.

According to Defendants: "Defendants object to an extension of the time for plaintiff to submit her pre-trial filings and motions in this matter as an extension will affect other Court-ordered dates and disadvantage defendants in trial preparation. Further, plaintiff's counsel objected to a short extension of the settlement conference in this case so that he may have adequate time to prepare plaintiff's pre-trial filings and motions and file on the scheduled date."

A settlement conference – the first in this case - was held on January 2, 2020. Today, when a settlement was not reached, I immediately asked defense counsel for consent to the requested extension. As the related docket entries (Dkts. 179-181) reflect, Plaintiff made every effort to accommodate Defendants' request to reschedule the settlement conference. Plaintiff also suggested a joint application to adjust the pre-trial deadlines, which Defendants declined to make. Although Defendants now complain that they will be prejudiced in preparing for trial if the Court grants the requested extension, they do not say how.

For my part, I am a solo practitioner working part-time and helping take care of two children under two years of age. I am in the process of engaging co-counsel to assist me in preparing for trial (including making the pre-trial submissions) and trying the case. Although I expect to have such co-counsel engaged soon, I will not be able to finalize those arrangements any earlier than the middle of next week.

Between today and January 17, 2020, I have filing deadlines in a federal civil as well as a state criminal appeal; appearances on assigned counsel cases and 8-hour arraignment shifts in New York City Criminal Court on three separate dates; and appearances in two civil hearings on two other dates.

[ I therefore respectfully request an adjustment of the January 17, 2020 deadline until February 3, 2020; or, alternately, until a date after January 20, 2020]but as close to February 3, 2020 as possible.

Thank you for your attention to this matter.

Respectfully submitted,


/S/

Gideon Orion Oliver

Mr. Oliver should submit a proposed order extending his date to make his January 17 submissions to January 24 and adjusting the date for all other submissions by 7 days and calculating the actual due date with all final pretrial submissions due no later than February 21.

SO ORDERED.

Dated: 1/8/2020

A handwritten signature in black ink, reading "P. Kevin Castel", written over a horizontal line.

P. Kevin Castel  
United States District Judge